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05/21/2008 11:24 AM
Please respond to
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To

Subject Stanley (MI) ECO questions

History: This message has been replied to and forwarded.

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Carolyn,

Based upon our conference call on May 7th, we have revisited 1) the descriptions of sample locations presented within the BERA and 2) the samples used in the background threshold value (BTV) calculations.

Revision 1. As we mentioned, all of the sample locations from which sediment samples were collected were locations which had previously been sampled by Weston/Earth Tech, with the exception of sample 07. The survey coordinates associated with these sample point were utilized to re-create the locations for our sampling effort. Survey coordinates were also established for sample location 07.

However, in creating the descriptions of the sample locations which appeared in Table 4-1 of the BERA Report, distances were scaled from the sample map that was included in the ENTACT's Work Plan for this effort. Subsequent to our conference call, ENTACT has made a much more accurate determination of sample locations using the actual sample coordinates. By obtaining an aerial photograph depicting the study site which was correlated to the same survey plane coordinates as the sample locations, the sample points could be plotted on the aerial photograph using a CADD program. From this, very accurate determinations of the distances between the sample locations and site features visible on the photograph could be obtained. We have thus revised the descriptions in Table 4-1 as follows:

REVISED TABLE 4-1
SUMMARY OF SEDIMENT SAMPLE LOCATIONS

Sample Designation	**Sample Location**
SD-J	Appro

2-0 0 1	xi m at el y 16 str ea m -f ee t do w ns tre a m of N or th Di tc h co nf lu en ce
S E/ R C 9/ 1- 0 0 2	A pp ro xi m at el y 32 str ea m -f ee t up str ea m th e N or th Di

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REVISED TABLE 4-1
SUMMARY OF SEDIMENT SAMPLE LOCATIONS

Sample Designation	Sample Location
SD-J2-001	Approximately 16 stream-feet downstream of North Ditch confluence
SE/RC 9/1-002	Approximately 32 stream-feet upstream the North Ditch confluence
SD—E2-003	Approximately 514 stream-feet upstream of North Ditch confluence.
SE/RE 3/3-004	Approximately 549 stream-feet upstream of North Ditch confluence.
SD—C1-005	Approximately 118 stream-feet downstream of CSX Rail Bridge
SD-A1-006	Approximately 44 stream-feet downstream of CSX Rail Bridge.
SD-007	Approximately 1,973 stream-feet downstream of sample point SD-SE/RC 13/1-008.
SD-SE/RC 13/1-008	Approximately 73 stream-feet downstream of north edge of culvert beneath Interstate I-96.

Note we are still characterizing these distances as "approximate" as 1) these distances are "stream-feet" (i.e., generally following the centerline of the river channel), and 2) they are referenced to landmarks in a generic format (e.g., the CSX Bridge, versus a specific point on the bridge).

In addition, we discussed the relative locations of the community survey transects to their respective sediment sample locations. As indicated in the BERA Report, survey station

08 was located several hundred feet downstream from sample SD-SE/RC 13/1-008. Other stations were generally located within 20 to 30 feet of their associated sediment sample locations. However, in reviewing my field notes, I note that the other reference sediment sample SD-07 was actually located approximately 100 feet downstream (north) of the community survey station 07. Again, this was done in order to place the survey station in a location of similar habitat as the other stations. As you may note from photographs 20 and 21, the location where the sediment sample was situated was extremely shallow, so the survey station was moved upstream to an area where the river morphology and habitat was more similar to the other survey locations. This is in line with the EPA guidance documents cited in the BERA Work Plan.

Revision 2. Based on EPA concerns, the 1994 sample data and sample locations SE/RC-100/1, SE/RC-101/1, SE-RC-102/1, and SE/RC-103/1 have been removed from the background dataset. The revised background dataset is provided in revised Table E-1; the BTV calculations are provided in revised Table E-2; the statistical comparison of site data and background data is provided in revised Table E-3; and the re-calculated BTVs are summarized in revised Table 7-3. As shown in Table E-3, arsenic and cadmium concentrations in investigative samples were again found to be similar to background levels; thus, these metals would not be considered COCs. These tables are attached to this email.

Of note, locations SE/RC-100 through SE/RC-103 are located upgradient of the Site in a drainage ditch that discharges to the Red Cedar River south of the railroad tracks. Thus, it does not appear that references to "Facility" on the historic sample map prepared by Weston/Earth Tech are indicating the former Stanley Tool Works facility.

If you have any further questions, please feel free to contact Jeff or me.

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